

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

In re Cablevision Consumer Litigation

This Document Relates To:

All Actions

Case No. 10-cv-04992 (JS) (AKT)

ECF Case

Electronically Filed

PLAINTIFFS' NOTICE OF TAKING DEPOSITION OF JONATHAN ORSZAG

TO: Defendants
c/o Andrew M. Genser
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022

PLEASE TAKE NOTICE, that pursuant to Fed. R. Civ. P. 30, Plaintiffs will take the deposition of the following individual upon oral examination before a notary public or other qualified officer at the offices of Kirkland & Ellis LLP, located at 601 Lexington Avenue, New York, New York 10022, commencing on the following date and time, and continuing thereafter by adjournment until completed:

1. Jonathan Orszag, October 2, 2014, at 8:00 A.M.

The testimony in this deposition will be recorded by video and stenographic means.

PLEASE TAKE FURTHER NOTICE, that Jonathan Orszag, or his representative, is requested to bring with him to the deposition the following documents:

See Schedule of Documents

Dated: September 22, 2014

STONE BONNER & ROCCO LLP

LAW OFFICE OF TODD J. KROUNER

By: /s/ Ralph M. Stone
Ralph M. Stone
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By: /s/ Todd J. Krouner
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SHAHMOON & ELLISEN LLP

BY: /s/ Carol S. Shahmoon
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Co-Lead Counsel for Plaintiffs

SCHEDULE OF DOCUMENTS

1. Jonathan Orszag's complete file concerning this matter, In re Cablevision Consumer Litigation, Case No. 10-cv-04992 (JS) (AKT) (E.D.N.Y.), including without limitation:

- (a) all materials provided for his review in this matter;
- (b) all materials he relied on in formulating opinions in this matter;
- (c) all literature he reviewed related to this matter;
- (d) all literature he relied upon in formulating opinions in this matter;
- (e) all documents, literature and other material things examined or reviewed by him in preparation for his deposition in this matter; and
- (f) all documents, literature and other material things about which he will testify at trial in this matter.

2. All documents concerning payments made by or on behalf of or in representation of Cablevision Systems Corporation and/or CSC Holdings, LLC (collectively referred to herein as "Cablevision") to Jonathan Orszag, or any entity, including without limitation, Compass Lexecon, Competition Policy Associates, Inc. (a/k/a COMPASS), FTI Consulting, Inc., Competition Policy Associates, Inc., and Sebago Associates, Inc., as a result of services rendered or services agreed to be rendered by Jonathan Orszag.

3. In the Matter of Game Show Network, LLC v Cablevision Systems Corporation, File No. CSR-8529-P, before the Federal Communications Commission, all expert reports and documents produced, which were authored by Jonathan Orszag; materials Jonathan Orszag relied on in authoring expert reports or documents produced; and testimony by Jonathan Orszag, including without limitation:

- (a) Expert Report dated on or about December 12, 2011;

- (b) Reply Declaration dated on or about February 9, 2012;
- (c) Expert Report dated on or about December 14, 2012;
- (d) Deposition Testimony from on or about February 7, 2013; and
- (e) Direct Testimony from on or about March 12, 2013.

4. In the Matter of DISH Network L.L.C. v Madison Square Garden, Inc., Madison Square Garden, L.P., and Cablevision Systems Corp., File No. CSR-8367-P, before the Federal Communications Commission, all expert reports and documents produced, which were authored by Jonathan Orszag; materials Jonathan Orszag relied on in authoring expert reports or documents produced; and testimony by Jonathan Orszag.

5. In the Matter of NFL Enterprises LLC v. Comcast Cable Communications, LLC, File No. CSR-7876-P, before the Federal Communications Commission, all expert reports and documents produced, which were authored by Jonathan Orszag; materials Jonathan Orszag relied on in authoring expert reports or documents produced; and testimony by Jonathan Orszag, including without limitation:

- (a) Declaration with Jay Ezrielev dated on or about June 20, 2008;
- (b) Expert Report dated on or about March 13, 2009;
- (c) Deposition Testimony from on or about April 1, 2009;
- (d) Written Direct Testimony from on or about April 6, 2009; and
- (e) Courtroom Testimony from on or about April 16, 2009.

6. In The Matter of The Tennis Channel v. Comcast Cable Communications, LLC, in File No. CSR-8258-P, before the Federal Communications Commission, all expert reports and documents produced, which were authored by Jonathan Orszag; materials Jonathan Orszag relied

on in authoring expert reports or documents produced; and testimony by Jonathan Orszag, including without limitation:

- (a) Declaration dated on or about February 11, 2010;
- (b) Reply Declaration dated on or about April 13, 2010;
- (c) Expert Report dated on or about February 25, 2011;
- (d) Deposition Testimony from on or about March 8, 2011;
- (e) Written Direct Testimony dated on or about April 15, 2011;
- (f) Rebuttal Declaration dated on or about April 26, 2011;
- (g) Courtroom Testimony from on or about April 27, 2011;
- (h) Supplemental Deposition Testimony from on or about May 1, 2011; and
- (i) Supplemental Rebuttal Declaration dated on or about May 12, 2011.

7. In The Matter of TCR Sports Broadcasting Holding, LLP d/b/a Mid-Atlantic Sports Network v. Comcast Corporation, in MB Docket No. 08-214, File No. CSR-8001-P, before the Federal Communications Commission, all expert reports and documents produced, which were authored by Jonathan Orszag; materials Jonathan Orszag relied on in authoring expert reports or documents produced; and testimony by Jonathan Orszag, including without limitation:

- (a) Declaration with Jay Ezrielev dated on or about July 31, 2008;
- (b) Expert Report dated on or about March 19, 2009;
- (c) Deposition Testimony from on or about April 23, 2009;
- (d) Courtroom Testimony from on or about May 26, 2009; and
- (e) Reply Declaration dated on or about June 1, 2009.

8. To the extent not otherwise produced, all testimony and expert reports provided by Jonathan Orszag for or on behalf of Cablevision.

9. To the extent not otherwise produced, all testimony and expert reports provided by Jonathan Orszag for or on behalf of Kirkland & Ellis LLP.

10. To the extent not otherwise produced, all testimony and expert reports provided by Jonathan Orszag for or on behalf of Willkie Farr & Gallagher LLP.

11. To the extent not otherwise produced, all testimony and expert reports provided by Compass Lexecon for or on behalf of Cablevision.

12. To the extent not otherwise produced, all testimony and expert reports provided by Compass Lexecon for or on behalf of Kirkland & Ellis LLP.

13. To the extent not otherwise produced, all testimony and expert reports provided by Compass Lexecon for or on behalf of Willkie Farr & Gallagher LLP.

14. To the extent not otherwise produced, all consulting, independent contractor, employment or other agreements between Jonathan Orszag and Cablevision.

15. For the period from January 1, 2006 to present, all consulting, independent contractor or other agreements between Cablevision and the following:

- (a) Compass Lexecon;
- (b) Competition Policy Associates, Inc. (a/k/a COMPASS); and
- (c) FTI Consulting, Inc.

16. For the period from March 1, 2000 through December 31, 2005, all consulting, independent contractor or other agreements between Cablevision and the following:

- (a) Competition Policy Associates, Inc.; and
- (b) Sebago Associates, Inc.

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing *Plaintiffs' Notice of Taking Deposition of Jonathan Orszag* has been forwarded via email and mail to the below-listed attorney for Defendants on September 22, 2014, in accordance with the requirements of the Federal Rules of Civil Procedure:

Andrew M. Genser
Kirkland & Ellis LLP
601 Lexington Avenue
New York, New York 10022

LAW OFFICE OF TODD J. KROUNER

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Co-Lead Counsel for Plaintiffs